

2017R00153

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 18-505 (RBK)  
v. : HON. ROBERT KUGLER  
KENNETH CRAWFORD JR. :

**UNITED STATES NOTICE UNDER RULE 404(b)**

The United States is providing notice of its intent to introduce certain evidence under Rule 404(b) of the Federal Rules of Evidence. Although we contend that the evidence identified in this notice is inextricably intertwined with the offense conduct, and therefore admissible independent of Rule 404(b), we provide this notice out of an abundance of caution.

The United States intends to introduce evidence that (1) prior to recruiting clients to participate in the “Mortgage Recovery Program” described in the indictment, the defendant, for a fee, attempted to eliminate these clients’ mortgages through the creation and filing of fictitious documents, including “Private Registered Setoff Bonds;” (2) prior to recruiting clients to participate in the “Mortgage Recovery Program” described in the indictment, the defendant, for a fee, provided these clients with frivolous and fraudulent pleadings to mail their lenders and file in foreclosure proceedings in order to prevent foreclosure; and (3) the defendant failed to file tax returns for 2015 and 2016 reporting the income he received from clients who participated in the mortgage recovery program.

This evidence was included in the discovery hand-delivered to the defendant at a status hearing on February 8, 2019. To the extent the evidence described above is not inextricable intertwined with the offense conduct, it is admissible under Rule 404(b) because it proves motive, intent, and knowledge.

Respectfully submitted by:

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/s/Sean M. Green  
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CERTIFICATE OF SERVICE

I hereby certify that on this 27<sup>th</sup> day of March, I filed this notice via ECF and caused a copy to be mailed to:

Ken Crawford Jr.  
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